	Page 1			
UNITED STATES DISTRICT OF WES				
THE CITY OF HUNTINGTON,)			
Plaintiff,))			
vs.	,)) Civil Action			
AMERISOURCEBERGEN DRUG CORPORATION, et al.,) No. 3:17-01362			
Defendants.))			
CABELL COUNTY COMMISSION,)))			
Plaintiff,)) Civil Action			
vs.	No. 3:17-01665			
AMERISOURCEBERGEN DRUG CORPORATION, et al.,)))			
Defendants.	,)			
WEDNESDAY, JULY 29	, 2020			
HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER CONFIDENTIALITY REVIEW				
Remote videotaped deposition of David G. Chaffin, Jr., M.D., held at the location of the witness in Huntington, West Virginia, commencing at 9:10 a.m., on the above date, before Carrie A. Campbell, Registered Diplomate Reporter and Certified Realtime Reporter.				
GOLKOW LITIGATION SERVICES 877.370.3377 ph 917.591.5672 fax deps@golkow.com				

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	BY: ANNIE E. KOUBA	2 David Chaffin LinkedIn page printout 66
10	akouba@motleyrice.com MONIQÚE A. CHRISTENSON	3 "History of postpartum depression as 67
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	Charleston, South Carolina 29464	14 Behaviors
12 13	(843) 216-9000 and	15 4 "Prevalence of Drug Use in Pregnant 76 West Virginia Patients," Chaffin, et
14	CAREY, SCOTT, DOUGLAS & KESSLER, PLLC	16 al.
	BY: DAVID R. POGUE drpogue@csdlawfirm.com	17 5 Application for Federal Assistance, 101 SF 424 (R&R), The Effect of
16	901 Chase Tower	18 Peripartum Depression on Maternal
17	707 Virginia Street, East (25301) Charleston, West Virginia 25323	Opioid Use Disorder and Neonatal 19 Opioid Withdrawal Syndrome,
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2	BY: SHANA E. RUSSO	parenting in recovery for OUD in new
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3 4 5	BY: SHANA E. RUSSO srusso@reedsmith.com 506 Carnegie Center, Suite 300 Princeton, New Jersey 08540 (609) 987-0050 and BY: CLIFF BREESE, III Three Logan Square 1717 Arch Street, Suite 3100 Philadelphia, Pennsylvania 19103	parenting in recovery for OUD in new mothers," ValleyHealthSystems_0000352 - ValleyHealthSystems_0000454 (Exhibits attached to the deposition.) CERTIFICATE
3 4 5 6 7	BY: SHANA E. RUSSO srusso@reedsmith.com 506 Carnegie Center, Suite 300 Princeton, New Jersey 08540 (609) 987-0050 and BY: CLIFF BREESE, III Three Logan Square 1717 Arch Street, Suite 3100 Philadelphia, Pennsylvania 19103 (215) 851-8100	parenting in recovery for OUD in new mothers," ValleyHealthSystems_0000352 - ValleyHealthSystems_0000454 (Exhibits attached to the deposition.) CERTIFICATE
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Charleston, in maternal/fetal medicine and was there for four years. And then in 1998, I started here at Marshall University. Q. And you have hospital privileges? A. It do. Q. Where? A. At Cabell Huntington Hospital. Q. So since 1998, have you practiced obsterrics and gynecology there in Cabell Huntington? A. Yes. A. The you board certified? A. The board certified in OB/GYN. Board cligible still, I think, in marshall that time in 1998 when you came to Cabell Huntington, particularly as it applies to you have an opinion within a reasonable degree of medical probability whether or not there exists a public health crisis in Cabell-Huntington in relationship to opioid use? MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: Q. You can answer. MS. RUSSO: Objection to form. QUESTIONS BY MS. WILDE: A. The data probability whether or not there exists a public health crisis in can object to with perhaps not so much of an objection but an observation. So I would direct him to answer this question and the line of questions to the extent that he has personal knowledge of the facts. To my knowledge, he's not been compensated as an expert of any testing addiction, which I lided'nt make that clear, that is what I want, Dr. Cha		Page 10		Page 12		
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4 here at Marshall University. 5 Q. And you have hospital 6 privileges? 7 A. I do. 8 Q. Where? 9 A. At Cabell Huntington Hospital. 10 Q. So since 1998, have you 11 practiced obstetrics and gynecology there in 12 Cabell Huntington? 13 A. Yes. 14 Q. Are you board certified? 15 A. I'm board certified in OB/GYN. 16 Board cligible still, I think, in 17 maternal/fetal medicine. 18 Q. So, Dr. Chaffin, let's talk, if 19 we can, about observations you've made since that time in 1998 when you came to Cabell 21 Huntington, particularly as it applies to opioids. And let me start off by just asking a a very general question. 22 a very general question. 23 a very general question. 24 Based upon your practice, your 25 knowledge, your expertise of maternity/fetal duse? 25 knowledge, your expertise of maternity/fetal segree of medical probability whether or not the rewists a public health crisis in a medicine in the Cabell-Huntington in relationship to opioid use? MS. RUSSO: Objection to form. 26 Q. You can anyour. 27 A. Thave kind of broad. I'm not sure what you're asking. 28 Q. Sour. Chaffin, let's talk, if we can, about observations you've made since that time in 1998 when you came to Cabell time frame. When did you start to see this of ity you can pipoint— and if you can't, just give me a broad, general time frame. When did you start to see this of make there where a broad, general time frame. When did you start to see this of make there where two and four patients in a methadone program per year. A. When I joined and probably the frame time and probably the frame and the line of the proper and probably for four years after that there was still a steady increase. 1 time: Q. Do you still, Doctor — again, based on your observations of the area, is plateaued? 1 thas it begun to decrease? Have you made any observations regarding that? A. That cabell Huntington in relationship to opioid use? A. That of the me star of by just asking a time frame. When did you start to see this of make that elear, when I is attend the progr	3		3			
6 privileges? 7 A. I do. 8 Q. Where? 9 A. At Cabell Huntington Hospital. 10 Q. So since 1998, have you 11 practiced obstetrics and gynecology there in 12 Cabell Huntington? 13 A. Yes. 14 Q. Are you board certified? 15 A. I'm board certified in OB/GYN. 16 Board eligible still, I think, in 17 maternal/fetal medicine. 18 Q. So, Dr. Chaffin, let's talk, if 19 we can, about observations you've made since that time in 1998 when you came to Cabell 20 thuntington, particularly as it applies to opioids. And let me start off by just asking a a very general question. 21 Huntington, Particularly as it applies to opioids. And let me start off by just asking a a very general question. 22 Monowledge, your expertise of maternity/fetal 23 a very general question. 24 Dege 11 25 Cabell-Huntington area, do you have an opinion within a reasonable deser of medicine in relationship to opioid use? 26 MS. RUSSO: Objection to form. 27 MS. RUSSO: Objection to form. 28 QUESTIONS BY MS. WILDE: 29 Q. You can answer. 30 MR. JONES: I'd like to briefly interject with perhaps not so much of compensated as an expert of any tensity interject with perhaps not so much of compensated as an expert of any tensity interject with perhaps not so much of compensated as an expert of any tensity interject with perhaps not so much of thing interject with perhaps not so much of compensated as an expert of any tensity in the program because there was nobody else taking care of pregnant particularly. 29 And then early 2000s, we started to see an increase? Have you made any observations regarding that? 30 And then early 2000s. we started the program because there was nobody else taking care of pregnant particularly when I started the program because there was nobody else taking care of pregnant particularly interject with perhaps not so much of an objection but an observation. 31 Dr. Chaffin is here as a fact witness. He's not a retained expert. 32 To my knowledge, he's not been compensated as an expert of any testimony. 33 Call Huntington and the line of questi	4		4	•		
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A That's kind of broad. I'm not sure what you're asking. Q. So since 1998, have you 10 10 Q. So since 1998, have you 10 11 practiced obstetries and gynecology there in 12 12 Cabell Huntington? 12 13 A. Yes. 13 14 Q. Are you board certified? 14 15 A. I'm board certified in OB/GYN. 15 16 Board eligible still, I think, in 16 17 maternal/fetal medicine. 17 18 Q. So, Dr. Chaffin, let's talk, if 19 19 we can, about observations you've made since 19 20 opioids. And let me start off by just asking 20 21 a very general question. 21 22 poioids. And let me start off by just asking 21 23 a very general question. 22 24 Based upon your practice, your 24 25 knowledge, your expertise of maternity/fetal 25 26 degree of medical probability whether or not 19 27 there exists a public health crisis in 25 28 Gabell-Huntington in relationship to opioid 19 29 use of medical probability whether or not 19 30 there exists a public health crisis in 25 31 Gabell-Huntington in relationship to opioid 19 32 use what you're asking. 29 33 warked increase of opioid use and addiction. When would you say that you began to notice, if you can pinpoint - and if you can't, just give me a broad, general time frame. When did you start to see this or make these observations? A. When I joined and probably the 19 34 maternal/fetal medicine. 17 45 would have between two and four patients in a methadone program pre year. 22 35 A. When I joined and probably the 19 36 maternal/fetal medicine. 22 37 A. When I joined and probably the 19 38 maternal/fetal medicine. 21 39 indicine in the Cabell-Huntington area, do you wate an opinion within a reasonable 29 30 degree of medical probability whether or not there exists a public health crisis in 30 degree of medical probability whether or not there exists a public health crisis in 30 degree of medical probability whether or not there exists a public health crisis in 30 degree of medical probability whether or not there exists a public health crisis in 30 degree of medical probability whether or not there exists a pub	7		7	When and what have you		
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13 14 15	David G. Chaffin, Jr., M.D. Date	12 13 14 15 16		
16	Subscribed and sworn to before me this, 20 My commission expires:,	17 18		
18	Notary Public	19 20 21	 	
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1	Page 115			
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